

LUIS RENE VELASCO  
450 W CRAWFORD ST #1  
NOGALES, AZ 85621

FILED

2009 APR -8 A 11: 53

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA

CLERK  
U.S. BANKRUPTCY  
DISTRICT OF ARIZONA

In re:	)	
	)	Chapter 13 Proceeding
Luis Rene Velasco	)	4:09-bk-23695-JMM
	)	
Debtor	)	
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JPMORGAN CHASE BANK,	)	RESPONSE TO MOVANT'S MOTION
N.A., successor by merger	)	TO LIFT THE AUTOMATIC STAY
to Bank One N.A.	)	
Movant	)	
vs	)	Real Property located at:
	)	850 W Saddle Drive
Luis Rene Velasco, Debtor;	)	Nogales AZ 85621
and	)	
Dianne C. Kerns, Trustee	)	
Respondents	)	
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Comes now debtor and for his response to Movant's Motion to lift the Automatic Stay, and enters the following:

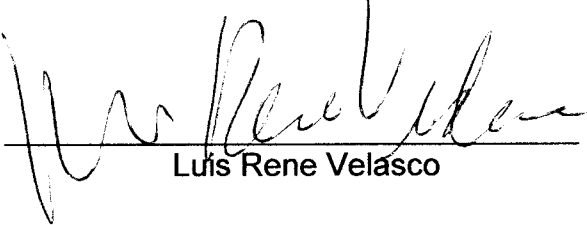
1. Answering paragraphs 1 through 4, debtor admits the allegations therein.
2. Answering paragraph 5, debtor admits default but regarding the balance of paragraph 5, debtor is without sufficient information to admit or deny and therefore denies same.
3. Answering paragraph 6, debtor is without sufficient information to admit or deny and therefore denies same.
4. Answering paragraph 7, sentences 1 and 2, debtor admits the

allegations therein. Regarding the balance of paragraph 7, debtor is without sufficient information to admit or deny and therefore denies same.

5. Answering paragraph 8, debtors deny the allegations therein.

WHEREFORE, having fully answered the motion, Debtor prays that same be denied, that he has his costs incurred herein, that he has his attorney's fees as and when incurred, and that he has such other and further relief as may be deemed just and proper in the premises.


Dated this 7 day of April 2010.

  
Luis Rene Velasco

A copy of the foregoing mailed this date to:

**DIANNE C. KERNS, Trustee**  
7320 N. LA CHOLLA #154 PMB 413  
TUCSON, AZ 85741-2305

Mark S. Bosco  
Leonard J. McDonald  
TIFFANY & BOSCO  
2525 E Camelback Rd, Ste 300  
Phoenix AZ 85016

BY:   
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